



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

LHE/JAM
F. #2018R01064

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 17, 2020

By ECF

The Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Michael Cohn
Criminal Docket No. 19-97 (S-1) (GRB)

Dear Judge Brown:

The government respectfully submits this letter in response to the filing the government understands was made by defense counsel earlier this afternoon. See ECF Docket No. 74. The government requests that the additional requirements that the defense asks to be incorporated into the Third Party Protective Order, namely, that: (1) Mr. Cohn is restricted from making copies of the sensitive material; (2) Mr. Cohn must keep the sensitive material in his home; and (3) Mr. Cohn may only review the sensitive material alone or with authorized persons, be incorporated into the Protective Order in place as to government discovery, see ECF Docket No. 24, which includes, among other things, sensitive materials that were produced to the government by the United States Securities and Exchange Commission ("SEC"). Accordingly, for avoidance of confusion, the government respectfully submits that all sensitive materials should be subject to the same restrictions during this period, no matter which party produced the materials to the defense. Defense counsel have advised that they do not object to this additional modification.

The government thanks the Court for its patience during the parties' efforts to navigate these unusual circumstances.

Respectfully submitted,

RICHARD P. DONOGHUE
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cc: Clerk of the Court (GRB) (by ECF)
Defense counsel (by ECF and Email)